

1 **SPINELLI, DONALD & NOTT**

A Professional Corporation

2 DOMENIC D. SPINELLI, SBN: 131192

J. SCOTT DONALD, SBN: 158338

3 601 University Avenue, Suite 225

Sacramento, CA 95825

4 Telephone: (916) 448-7888

Facsimile: (916) 448-6888

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6 Attorneys for Defendants County of
Siskiyou; Jeremiah LaRue and Jesus
Fernandez, in their official capacities
7 as members of the Siskiyou County
Sheriff's Department and in their individual
8 capacities; Brandon Criss, Ed Valenzuela,
Michael N. Kobseff, Nancy Ogren, and
9 Ray A. Haupt, in their official capacities
as members of the Siskiyou County Board
10 of Supervisors and in their individual
capacities; Edward Kiernan, in his official
11 capacity as County Counsel for Siskiyou
County and in his individual capacity;
12 and DOES 1-100.

13 UNITED STATES DISTRICT COURT

14 EASTERN DISTRICT OF CALIFORNIA

15 SACRAMENTO DIVISION

16 Dilevon Lo, Jerry Vang, Nathan Thao, Mao
Thao, Pao Lee, Antonio Lee, Koua Lee, Nhia
17 Thai Vang, Zeng Lee, Der Lee and Khue Cha

18 Plaintiffs,

19 vs.

20 County of Siskiyou; Jeremiah LaRue and
Jesus Fernandez, in their official capacities as
members of the Siskiyou County Sheriff's
21 Department and in their individual capacities;
and Brandon Criss, Ed Valenzuela, Michael
22 N. Kobseff, Nancy Ogren, and Ray A. Haupt,
in their official capacities as members of the
23 Siskiyou County Board of Supervisors and in
their individual capacities; Edward Kiernan,
24 in his official capacity as County Counsel for
Siskiyou County and in his individual
25 capacity; and DOES 1-100,

26 Defendants.
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Case No.: 2:21-cv-00999-KJM-DMC

**DEFENDANTS' AMENDED
OBJECTIONS TO THE AFFIDAVIT OF
NHIA THAI VANG DATED JULY 6, 2021
(CM/ECF NO. 26)**

Complaint Filed: June 4, 2021

First Amended Complaint Filed: July 15, 2021

Date: August 6, 2021

Time: 10:00 AM

**[FEES EXEMPT PURSUANT TO
GOVERNMENT CODE SECTION 6103]**

Defendants hereby submit their objections to the supplemental affidavit filed by Nhia Thai Vang in support of Plaintiffs' original motion for TRO and preliminary injunction and the current motion for preliminary injunction.

Material Objected To:	Grounds for Objection:	Ruling on Objection:
Supplemental Affidavit of Nhia Thai Vang, July 6, 2021, ¶4 “In the June 11 affidavit, I explained that my wife and I were told we could not put in a well when we purchased our property in 2015 due to the high salt content. I also explained that my wife and I depend on our daughter and son-in-law to bring us water in 55-gallon drums.”	Hearsay. (FRE 801) Inadmissible opinion. (FRE 701) Prejudicial, confusing and misleading (FRE 403) Contradictory to original declaration ¶8	Sustained: _____ Overruled: _____
¶5 “My daughter and son-in-law both work full-time jobs so my wife and I are only able to get water from them when they have availability.”	Irrelevant. Prejudicial, confusing and misleading (FRE 403)	Sustained: _____ Overruled: _____
¶6 “My wife and I have chickens and ducks that we rely on for food. We also have two dogs. Before the water truck ban, we had over 100 chickens and ducks. Many of them have died due to lack of water. Now we only have around six or seven chickens and thirty ducks.”	Irrelevant. Prejudicial, confusing and misleading (FRE 403) Lacks foundation. Inadmissible opinion. (FRE 701)	Sustained: _____ Overruled: _____
¶7 “My wife and I have had to ask friends to borrow water when possible.”	Irrelevant. Prejudicial, confusing and misleading (FRE 403)	Sustained: _____ Overruled: _____
¶8 “Attached as Exhibit A are true and correct photos of my wife, Bao Lee, and me with our chickens on our property in Siskiyou County. The photos were taken on June 24, 2021.”	Irrelevant. Prejudicial, confusing and misleading (FRE 403)	Sustained: _____ Overruled: _____

Dated: July 29, 2021

SPINELLI, DONALD & NOTT

By: /s/ J. Scott Donald

J. SCOTT DONALD
Attorneys for Defendants